

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

BROWN RUDNICK LLP

Kenneth J. Aulet, Esq. (admitted *pro hac vice*)
Seven Times Square
New York, New York 10036
(212) 209-4800
kaulet@brownrudnick.com

BROWN RUDNICK LLP

Tristan Axelrod, Esq. (admitted *pro hac vice*)
One Financial Center
Boston, MA 02111
(617)856-8300
taxelrod@brownrudnick.com

General Counsel for the Plan Administrator

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
DStolz@genovaburns.com
DClarke@genovaburns.com

Local Counsel for the Plan Administrator

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Lauren M. Sisson, Esq. (NJ Bar No. 394182022)
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
lauren.sisson@haynesboone.com

Attorneys for the Plan Administrator

In re:

BLOCKFI INC., *et al.*,Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

Jointly Administered under a Confirmed Plan²

**APPELLEE/WIND-DOWN DEBTORS' COUNTER-DESIGNATION OF
ADDITIONAL ITEMS TO BE INCLUDED IN RECORD ON APPEAL**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications). [Docket No. 1609]

In accordance with Fed. R. Bankr. P. 8009(a)(2), Appellee BlockFi, Inc. (“Appellee”) respectfully submits the following counter-designation of additional items to be included on the record on appeal. Appellant George S. Wynns (“Appellant”) appeals from the November 6, 2023 Order of the U.S. Bankruptcy Court for the District of New Jersey (Hon. Michael B. Kaplan, U.S.B.J.) [ECF No. 1841] and the November 7, 2023 Order granting Debtors’ Tenth Omnibus Objection to Certain Claims [ECF No. 1841], which has been docketed as *George S. Wynns v. BlockFi, Inc.*, No. 3:23-cv-21306-ZNQ, in the U.S. District Court for the District of New Jersey [ECF No. 1895].

On December 20, 2023, Appellant filed a document titled “Notice Designating Record on Appeal and Statement of Issues” [ECF No. 2003]. Appellant’s Notice failed to list any items to be included in the record on appeal and Appellant has not indicated it has ordered the relevant transcripts as required by Fed. R. Bankr. P. 8009(b).

**DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN RECORD ON APPEAL**

Appellee cross-designates the following items to be included in the record on appeal, including the relevant transcripts that have already been ordered and filed on the record of the Bankruptcy Court, as noted below:

ECF No.	Filing Date	Description
17	11/28/22	Declaration Of Mark A. Renzi In Support Of Debtors’ Chapter 11 Petitions And First-Day Motions
121	12/19/22	Debtors’ Motion For Entry Of An Order (I) Authorizing The Debtors To (A) Honor Withdrawals From Wallet Accounts, (B) Update The User Interface To Properly Reflect Transactions And Assets As Of The Platform Pause, And (C) Conduct Ordinary Course Reconciliation Of Accounts, And (II) Granting Related Relief
609	3/13/23	Order Granting Debtors’ Motion For Entry Of An Order (A) Approving The (I) Omnibus Claims Objection Procedures And Form Of Notice, (II) Omnibus Substantive Claims Objections, And (III)

ECF No.	Filing Date	Description
		Satisfaction Procedures And Form Of Notice, (B) Waiving Bankruptcy Rule 3007(E), And (C)Granting Related Relief
822	5/2/23	Amended Declaration Of Amit Cheela, Chief Financial Officer Of Blockfi Inc., In Support Of The Debtors' Motion For Entry Of An Order (I) Authorizing The Debtors To (A) Honor Withdrawals From Wallet Accounts, (B) Update The User Interface To Properly Reflect Transactions And Assets As Of The Platform Pause, And (C) Conduct Ordinary Course Reconciliation Of Accounts, And (II) Granting Related Relief
842	5/7/23	Stipulated Facts as to Wallet Motion
853	5/9/23	Transcript of Hearing Held 5/8/23
923	5/27/23	Order (I) Authorizing The Debtors To (A) Honor Withdrawals From Wallet Accounts, (B) Update The User Interface To Properly Reflect Transactions And Assets As Of The Platform Pause, And (C) Conduct Ordinary Course Reconciliation Of Accounts, And (II) Granting Related Relief
1309	8/3/23	Third Amended Joint Chapter 11 Plan Of Blockfi Inc. And Its Debtor Affiliates Pursuant To Chapter 11 Of The Bankruptcy Code
1310	8/3/23	Disclosure Statement Relating to the Third Amended Joint Chapter 11 Plan Of Blockfi Inc. And Its Debtor Affiliates Pursuant To Chapter 11 Of The Bankruptcy Code
1437	9/1/23	Debtors' Tenth Omnibus Objection to Certain Claims
1510	9/15/23	Affidavit of Service
1573	9/22/23	Affidavit of Service
1588	9/23/23	Affidavit of Service
1633	10/2/23	Objection and Response of Secured Creditor George Wynns to Tenth Omnibus Objection to Certain Claims
1652	10/3/23	Affidavit of Secured Creditor George Wynns in Support of Creditor's Objection to Debtors' Tenth Omnibus Objection to Certain Claims
1655	10/3/23	Revised Findings Of Fact, Conclusions Of Law, And Order (I) Approving The Disclosure Statement Relating To The Third Amended Joint Chapter 11 Plan Of Blockfi Inc. And Its Debtor Affiliates Pursuant To Chapter 11 Of The Bankruptcy Code On A Final Basis And (II) Confirming The Third Amended Joint Chapter 11 Plan Of Blockfi Inc. And Its Debtor Affiliates Pursuant To Chapter 11 Of The Bankruptcy Code (Additional Technical Modifications)
1741	10/16/23	Motion of Secured Creditor George Wynns For Return of His 4.22 Bitcoin in Exchange for Owed Upon Loan
1811	10/30/23	Wind-Down Debtors' Objection To Motion Of Secured Creditor George Wynns For Return Of His 4.22 Bitcoin In Exchange For Owed Upon Loan

ECF No.	Filing Date	Description
1831	11/2/23	Wind-Down Debtors' Reply To George Wynns's Objection And Response To Debtors' Tenth Omnibus Objection To Certain Claims
1841	11/6/23	Order Denying Motion Of Secured Creditor George Wynns For Return Of 4.22 Bitcoin In Exchange For Owed Upon Loan
1846	11/7/23	Order Granting Debtors' Tenth Omnibus Objection To Certain Claims
1858	11/8/23	Transcript of Hearing Held 11/6/23
1867	11/10/23	Affidavit of Service
1895	11/20/23	Notice of Appeal to District Court

RESERVATION

Appellee reserves the right to amend, modify, and/or supplement the foregoing Counter-Designation.

Dated: January 3, 2024

Respectfully submitted,

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Lawrence Bluestone, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
DStolz@genovaburns.com
DClarke@genovaburns.com
LBluestone@genovaburns.com

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq.
Lauren M. Sisson, Esq.
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
lauren.sisson@haynesboone.com